

OSBORN LAW P.C. **MEMO ENDORSED**

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August 11, 2023

VIA ECF

Honorable Victoria Reznik
United States District Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Goodwine v. Commissioner of Social Security*
Civil Action No. 7:23-cv-04085-NSR-VR

Dear Judge Reznik,

We write on behalf of plaintiff, James Goodwine, and with the consent of the defendant, to request an extension of time to serve plaintiff's motion for judgment on the pleadings. Per the Court's May 18, 2023 Standing Scheduling Order, plaintiff's motion for judgment on the pleadings is due on August 16, 2023. Plaintiff respectfully requests an extension of time up to and including October 26, 2023. This is the parties' first request for an extension.

Plaintiff's counsel needs the additional time due to having nine Social Security briefs due in the next ten days.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- a. Plaintiff to file his motion for judgment on the pleadings on or before **October 26, 2023**;
- b. Defendant to file its response/cross-motion on or before **January 5, 2024**; and
- c. Plaintiff to file his reply (if any) on or before **January 26, 2024**.

Honorable Victoria Reznik
August 11, 2023
Page Two

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn

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cc: Victoria Treanor, Esq. (by ECF)

The proposed briefing schedule is approved.

APPLICATION GRANTED


Hon. Victoria Reznik, U.S.M.J.

Dated: August 15, 2023